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9
10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Jermaine Jamaica Campbell, Sr.,
13
14 Petitioner,
15 v.
16 Quentin Byrne, Warden, *et al.*,
17 Respondents.

Case No. 3:19-cv-00576-MMD-WGC

**Order Granting Unopposed
Motion to Extend Time for
Filing Opposition to
Respondents' Motion to Dismiss
(Second Request)**

1 Petitioner Jermaine Campbell respectfully asks this Court to enter an Order
2 extending his deadline for filing an opposition to Respondents' motion to dismiss by
3 14 days until August 11, 2021.

4 Undersigned counsel e-mailed Respondents' counsel on July 27, 2021, who does
5 not oppose this extension. This is Mr. Campbell's second request for an extension of
6 time.

7 Counsel has been diligently working on Mr. Campbell's opposition.
8 Unfortunately, she needs an additional 14 days to complete the opposition in light of
9 the complexity of the response, her recent schedule, upcoming deadlines, and
10 unexpected medical leave. In the past two months, besides case management
11 responsibilities including but not limited to reviewing materials in a recently
12 assigned case and preparing documents for expert review, counsel has filed: a reply
13 brief in support of an amended habeas petition in *Grant v. Byrne*, No. 3:16-cv-00104-
14 MMD-CLB (D. Nev.); two motions to strike or for more definite statement and their
15 respective reply briefs in *Herrada-Gonzalez v. Howell*, No. 2:20-cv-01013-GMN-DJA
16 (D. Nev.), and *Coleman v. Gittere*, No. 3:19-cv-00172-RCJ-WGC (D. Nev.); and an
17 application for certificate of appealability in *Finias v. Baker*, No. 21-15948 (9th Cir.).
18 She also travelled to Northern Nevada from June 10 to June 13, 2021, to make prison
19 visits to Lovelock Correctional Center as well as to Ely State Prison from June 23 to
20 June 25, 2021, to make prison visits. More recently, counsel attended a National
21 Association of Criminal Defense Lawyers' conference in Milwaukee, Wisconsin, from
22 July 21 through July 24, 2021. Accordingly, counsel seeks additional time to complete
23 and file the opposition.

24 This motion is not filed for the purpose of delay, but in the interests of justice,
25 as well as in the interest of Mr. Campbell.
26

Accordingly, counsel respectfully requests that this Court grant a 14-day extension of time for filing the opposition up to and including August 11, 2021, in order for the effective and thorough representation of Mr. Campbell.

Dated July 28, 2021.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Alicia R. Intriago

Alicia R. Intriago
Attorney for Petitioner

IT IS SO ORDERED:

A handwritten signature in blue ink, appearing to read "Miranda M. Du", is written over a horizontal line.

MIRANDA M. DU
CHIEF DISTRICT JUDGE

Dated: 7/29/2021